

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

BENJAMIN CRAIG, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CENTURYLINK, INC., GLEN F. POST, III
and R. STEWART EWING JR.,

Defendants.

No. 3:17-CV-01005-RGJ-JPM

DON J. SCOTT, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

CENTURYLINK, INC., GLEN F. POST, III,
R. STEWART EWING, JR. and DAVID D.
COLE,

Defendants.

No. 3:17-cv-01033-RGJ-JPM

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**NOTICE OF MOTION AND MOTION OF THE STATE OF OREGON BY AND
THROUGH THE OREGON STATE TREASURER AND THE OREGON PUBLIC
EMPLOYEE RETIREMENT BOARD, ON BEHALF OF THE OREGON PUBLIC
EMPLOYEE RETIREMENT FUND, FOR APPOINTMENT AS LEAD PLAINTIFF,
APPROVAL OF THEIR SELECTION OF LEAD COUNSEL,
AND CONSOLIDATION OF RELATED ACTIONS**

AMARENDRA THUMMETI, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

CENTURYLINK, INC., GLEN F. POST III
and R. STEWART EWING, JR.,

Defendants.

No. _____

PLEASE TAKE NOTICE that on August 21, 2017, or such other date as the Court designates, and at a time designated by the Court, before the Honorable Robert G. James, at the United States District Court for the Western District of Louisiana, located at the Federal Building, 201 Jackson Street, Suite 215, Monroe, Louisiana, the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund (“Oregon”), will respectfully move this Court for entry of an order, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”): (1) appointing Oregon as Lead Plaintiff in the above-captioned related securities class actions; (2) approving Oregon’s selection of Bernstein Litowitz Berger & Grossmann LLP (“Bernstein Litowitz”) and Stoll Berne to serve as Lead Counsel for the class; (3) consolidating the above-captioned actions and any related securities class actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; and (4) for any such further relief as the Court may deem just and proper.

This Motion is made on the grounds that Oregon believes it is the “most adequate plaintiff” under the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, Oregon believes that it has the “largest financial interest” in the relief sought by the Class in this action by virtue of, among other things, the losses of approximately **\$6.9 million** when calculated on a first-in, first-out (“FIFO”) basis and **\$6.3 million** on a last-in, first-out (“LIFO”) basis that Oregon incurred on its Class Period purchases of over 1.1 million shares of CenturyLink stock. Oregon also otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because its claims are typical of other class members’ claims and because they will fairly and adequately represent the interests of the class. Further, Oregon is the paradigmatic Lead Plaintiff envisioned by Congress in enacting the PSLRA because it is a sophisticated institutional investor with a

substantial financial stake in the litigation who will provide effective monitoring and supervision of counsel. This Motion is based upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Fred Williams Sartor, Jr. filed herewith, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Oregon respectfully requests that the Court: (1) appoint it as Lead Plaintiff in the above-captioned related securities class actions pursuant to the PSLRA; (2) approve its selection of Bernstein Litowitz and Stoll Berne to serve as Lead Counsel for the Class; (3) consolidate all related securities class actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; and (4) grant such further relief as the Court may deem just and proper.

Dated: August 21, 2017

Respectfully Submitted,

/s/ Fred Williams Sartor, Jr.

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 behalf of the Oregon Public Employee
 Retirement Fund*

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State of Oregon by and through the Oregon
State Treasurer and the Oregon Public
Employee Retirement Board, on behalf of
the Oregon Public Employee Retirement
Fund, and Proposed Lead Counsel for the
Class*

CERTIFICATE OF SERVICE

I hereby certify that on this day, August 21, 2017, I electronically filed the above Notice of Motion and Motion of The State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund for Appointment as Lead Plaintiff, Approval of Its Selection of Lead Counsel, And Consolidation Of Related Actions using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Fred Williams Sartor, Jr.

Fred Williams Sartor, Jr.